

OTHER BURDEN REDUCTION IDEAS

This document presents other burden reduction ideas that are not summarized as themes in the text of the NODA. In general, the ideas are organized by the type of information collection or by specific requirements. For each idea, the following information is presented:

- brief summary of the burden reduction idea;
- Information Collection Request (ICR) affected by the burden reduction idea;
- regulatory citation(s) affected by the burden reduction idea;
- current burden hours in the affected ICR;
- estimated burden reduction for the idea; and
- assumptions for the burden reduction estimate.

OTHER BURDEN REDUCTION IDEAS

Burden Reduction Idea	ICR Number(s)	Citation(s)	Current Baseline Burden (hours) ¹	Burden Reduction Estimate (hours) ²	Burden Reduction Assumptions
<p>A-1 (Notification)</p> <p>Streamline the notification form by eliminating the requirements to include a description of regulated wastes handled at the facility</p>	261	262.12 263.11 264.11 265.11 266.70	143,000	71,500	The burden reduction estimate was calculated by assuming that this suggestion will eliminate 50 percent of the burden associated with the form. Burden reduction estimate reflects a total over all regulated entities.
<p>A-2 (Notification)</p> <p>Revise subsequent notification requirements to require that subsequent notifiers only provide their EPA ID number and the appropriate information in Sections III, IV, V, VI, and VII, VIII, IX that have changed.</p>	261	262.12 263.11 264.11 265.11 266.70	143,000	5,500	The burden reduction estimate assumes 50 percent of the 44,000 notifications that would be received each year are subsequent notifications, and each repeat notifier would realize a savings of .25 hour per notification. Burden reduction estimate reflects a total over all regulated entities. This suggestion results in an approximately four percent burden reduction.

OTHER BURDEN REDUCTION IDEAS (continued)

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<p>A-3 (Notification)</p> <p>Number I The form asks whether this is the person's first notification of whether he has previously notified. If previously notified, they are to provide their ID number plus fill in the blanks for the other questions on the form. This change would be a clarification that if the person has an ID number, another form need not be provided.</p>	261	262.12 263.11 264.11 265.11 266.70	143,000	1,100	EPA estimates that 50 percent of the 44,000 respondents have previously notified and therefore do not need to fill out Number I. Assume it takes .05 hours for a respondent to fill out Number I. 44,000 respondents multiplied by 50% and by .05 hours = 1,100 hours
<p>A-4 (Notification)</p> <p>Number VIII Simplify this section to ask for the following information: generator greater than 1000 kg/mo, 100-1000 kg/mo, less than 100 kg/mo; transporter; and TSDF.</p>	261	262.12 263.11 264.11 265.11 266.70	143,000	2,200	EPA estimates that simplifying of the form would reduce the time respondents have to fill out Number VIII by .05 hours. 44,000 respondents multiplied by .05 hours = 2,200 hours.
<p>A-5 (Notification)</p> <p>Number IX Ask only for top 5 wastes by volume</p>	261	262.12 263.11 264.11 265.11 266.70	143,000	2,200	EPA estimates that the simplification of the form would reduce the time respondents have to fill out Number IX by .05 hours. 44,000 respondents multiplied by .05 hours = 2,200 hours.

OTHER BURDEN REDUCTION IDEAS (continued)

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<p>B-1 (Equipment Leak Requirements)</p> <p>Eliminate the equipment leak documentation requirements for hazardous waste determinations using process knowledge.</p>	1572	264 & 265.1063(d)(3)	3,366	3,366	EPA estimates that 100 percent of the burden for this requirement is eliminated.
<p>C-1 (Boiler and Industrial Furnace Requirements)</p> <p>Decrease records retention time from until closure of facility to three years.</p>	1361	266.102(e)10 266.103(k)	3,304 10,502	2,478 7,877	Since records retention would be reduced from "until closure of facility" to three years, the burden of recordkeeping is assumed to be reduced by 75 percent.
<p>D-1 (TSD Standards)</p> <p>Eliminate Demonstration</p>	1572	265.190(a)	2,080	2,080	
<p>D-2 (TSD Standards)</p> <p>Allow in-house engineer to certify</p>	1572	265.191 265.196(f)	0 44	0 44	
<p>E-1 (General Facility Standards)</p> <p>Eliminate need for documentation.</p>	1571	264.17(c)	89,461	89,461	EPA estimates that this suggestion would eliminate all of the burden associated with the documentation of compliance with the requirements to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes.

OTHER BURDEN REDUCTION IDEAS (continued)

Burden Reduction Idea	ICR Number(s)	Citation(s)	Current Baseline Burden (hours) ¹	Burden Reduction Estimate (hours) ²	Burden Reduction Assumptions
E-2 (General Facility Standards) Allow in-house engineer to certify.	1571	264.115; 265.115	3,042	0	EPA estimates that, while this suggestion would not necessarily reduce burden, it would likely reduce the cost since companies may use in-house engineers rather than hire an outside consultant to certify closure.
E-3 (General Facility Standards) Allow in-house engineer to certify.	1571	264.120; 265.120	120	0	EPA estimates that, while this suggestion would not necessarily reduce burden, it would likely reduce the cost since companies may use in-house engineers rather than hire an outside consultant to certify completion of post-closure care.
F-1 (Identification, Rulemaking, and Listing Petitions) Extend to three years the duration of a variance's period of validity.	1189	260.31(a)	175	116	Assume the burden reduction would be reduced by two thirds since the suggestion extends to three years the duration of a variance's period. 5 respondents multiplied by 67% and by 35 hours = 116 hours.
F-2 (Identification, Rulemaking, and Listing Petitions) Eliminate the requirement that a petitioner survey the industry-wide prevalence of the material production process.	1189	260.31(b) 260.33(a)	730	730	All burden associated with this activity would be eliminated.

OTHER BURDEN REDUCTION IDEAS (continued)

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<p>F-3 (Identification, Rulemaking, and Listing Petitions)</p> <p>Eliminate the requirement that facilities submit in the annual report an estimate of the expected number of treatability studies and the amount of waste expected to be used in the treatability studies in the upcoming year.</p>	1189	261.4(f)(9)	5,773	5,773	EPA estimates that this suggestion eliminate all of the burden associated with this requirement.

1. Baseline burden comes from current OSW ICRs.

2. Burden reduction estimates were developed using current approved OSW ICRs and assumptions described in the "Burden Reduction Assumptions" column.